REMARKS

Claims 1, 2, 4-22 and 24-41 are presented for consideration, with Claims 1, 16, 17, 21 and 34, 35 and 37-39 being independent.

The claims have been amended to further distinguish Applicants' invention from the cited art. Claims 3 and 23 have been cancelled.

The amendments to the claims were not presented earlier as it was believed that the previously presented claims would be found allowable. This Amendment cancels claims without adding any additional claims. Moreover, the Examiner's familiarity with the subject matter of the present application will allow an appreciation of the significance of the amendments herein without undue expenditure of time and effort. Finally, the Amendment does not raise new issues requiring further consideration or search. Accordingly, it is submitted that entry of the Amendment is appropriate.

Claims 1-4, 6-9, 11-24 and 26-41 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Vaswani '746. In addition, Claims 5, 10 and 25 are rejected under 35 U.S.C. §103 as allegedly being obvious over Vaswani in view of Bright '977. These rejections are respectfully traversed.

Claim 1 of Applicants' invention relates to a method of processing data defining a plurality of first polygons and texture data therefor, to generate data defining a texture map. The method includes the steps of determining a respective measure of the uniformity of the texture data for each polygon, and defining a respective second polygon in a two-dimensional area for each first polygon to store texture data therefrom, such that each second polygon is defined with

an area dependent upon the measure of the uniformity of the texture data determined for the corresponding first polygon and such that the area increases as the uniformity of the texture data to be stored therein decreases. The texture data for the second polygons is generated independence upon the texture data for the first polygons.

In accordance with Claim 1 of Applicants' invention, a high performance texture map generation technique is provided.

The Vaswani patent relates to a graphics system capable of applying texture to polygons through a texture mapping process, using an MIP mapping scheme. The Office Action asserts that Vaswani determines a respective measure of the importance of texture data for each first polygon, and defines a respective second polygon in a two-dimensional area for each first polygon to store texture data therefrom.

In contrast to Applicants' claimed invention, however, Vaswani is not understood to teach or suggest, among other features, determining a respective measure of the uniformity of the texture for each first polygon, and defining a respective second polygon with an area dependent upon the determined uniformity of the texture data such that the area increases as the uniformity of the texture data to be stored therein decreases. In rejecting Claim 3 (now cancelled), the Office Action asserted that the determination of the measure of importance of texture data is based upon the amount of detail in texture data (*measure of uniformity of texture data*).

It is respectfully submitted, however, that Vaswani fails to determine uniformity of the texture data and use such information to define a second polygon as recited in Claim 1 of

Applicants' invention. <u>Vaswani</u> discloses, in discussing the brick texture 44 shown in Figure 2, that different texture maps, with varying levels of detail, are used to represent different bricks based on how close the bricks are to the viewer. In this way, a brick closer to the viewer will be provided with greater detail. As understood, however, <u>Vaswani</u> does not measure the uniformity of the texture data and use this information in defining a second polygon. It is submitted, therefore, that <u>Vaswani</u> fails to anticipate or render obvious Applicants' invention as set forth in independent Claim 1.

Claims 21 and 37 relate to an apparatus for processing data and correspond to Claim 1. These claims are thus also submitted to be patentable over <u>Vaswani</u>.

The remaining independent claims, i.e., Claims 16, 17, 34, 35, 38 and 39, relate to either a method or an apparatus for processing data and rely on a determination of uniformity of the texture data. For similar reasons discussed above, therefore, these claims are also submitted to be patentable over <u>Vaswani</u>.

Therefore, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §102(b) is respectfully requested.

The secondary citation to <u>Bright</u> relates to a method for compressing image data and is relied upon for teaching importance of texture data being determined in dependence upon gray scale values. <u>Bright</u> fails, however, to compensate for the deficiencies in <u>Vaswani</u> as discussed above with respect to Applicants' independent claims. Therefore, the combination of art, even if proper, still fails to teach or suggest Applicants' claimed invention. Therefore, reconsideration and withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

Accordingly, it is submitted that Applicants' invention as set forth in independent Claims 1, 16, 17, 21, 34, 35 and 37-39 is patentable over the cited art. In addition, dependent Claims 2, 4-15, 18-20, 22, 24-33, 36, 40 and 41 set forth additional features of Applicants' invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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